



Indiana Department of Environmental Management
Office of Air Management
Rule Fact Sheet
October 4, 2000

Natural Gas Combustion Sources
99-218 (APCB)

Overview

This rulemaking concerns particulate matter emissions limits for combustion sources that burn only natural gas in certain counties and corrections to source descriptive information. IDEM has combined two rulemakings that amend 326 IAC 6-1, #98-211 and #99-218, in this rulemaking.

Citations Affected

Amends: 326 IAC 6-1

Affected Persons

Facilities listed in 326 IAC 6-1, excepting facilities listed in 326 IAC 6-10.1 through 326 IAC 6-11.2, that have 100% natural gas combustion sources. Facilities listed in 326 IAC 6-1 that have descriptive corrections.

Potential Cost

There are no potential costs to facilities or to state or local governments.

Outreach

IDEM sent a letter in July, 1999, to sources listed in 326 IAC 6-1 asking for corrections to descriptive information in the rules. In July, 2000, IDEM sent notifications to interested parties that the Second Notice of Comment period and draft rule would be published in the August 1, 2000, Indiana Register.

Description

Section 110 of the Clean Air Act requires states to adopt plans for the implementation, maintenance, and enforcement of air quality standards to ensure that areas of nonattainment for these standards move toward attainment

status within the time frame specified by the United States Environmental Protection Agency (U.S. EPA). Plans adopted by IDEM include, among other control measures, particulate matter emission limits for combustion sources located in Clark, Dearborn, Dubois, Howard, Lake, Marion, St. Joseph, Vanderburgh, Vigo, and Wayne Counties. Particulate matter limits that are specific to sources are set out in 326 IAC 6-1-8.1 through 326 IAC 6-1-18 and are based on criteria that include potential emissions, stack tests, modeling, and available control technologies.

One common and effective approach to reduce particulate emissions is for sources to burn natural gas, which has low particulate emissions. IDEM established numerical emissions limits for many sources in these counties based on their use of natural gas as fuel.

Potential emissions are calculated using U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors. U.S. EPA periodically updates AP-42 and revises emission factors based on new or better information. The fifth edition (1995) of this document includes emission factors, for natural gas fired combustion sources, that have changed since IDEM developed the original particulate matter limits. A number of combustion sources have informed IDEM that they cannot meet the limits for particulate matter when the limits are calculated using the new emission factors. These sources combust only natural gas, which is considered an extremely clean burning fuel for particulate matter, yet sources still cannot meet the limits due to the emission factor change. By

burning natural gas, these sources already have the lowest possible emissions, so by removing the emission limits but requiring sources to continue to burn only natural gas, the sources will continue to emit the lowest level of particulates possible. It is important to note that only the emission factors, not actual particulate emissions, have changed.

In order to address this concern, IDEM proposes that combustion sources that burn only natural gas and that are located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, and Wayne Counties not be required to meet a numerical emissions limit. Instead the rule would contain a specific requirement that limits fuel usage at these sources to natural gas only. This would have no actual impact on air quality, provided these sources burn only natural gas and thereby continue to achieve the lowest possible emission rates. This rulemaking would not apply to Lake County sources listed in 326 IAC 6-1-10.1 through 326 IAC 6-1-11.2, because Lake County's attainment plan is based on particulate matter ten micron (PM_{10}) rather than on total particulates. This modification would not alter actual particulate matter emissions. The state implementation plan would not require substantive changes.

Another purpose of this rulemaking is to obtain up-to-date source information. IDEM sought, in particular, information concerning facility name changes and removal or closure of any combustion sources listed in the rule. The draft rule reflects corrections that IDEM has already received through responses to the First Notice of Comment period and outreach to listed sources.

Consideration of Factors Outlined in Indiana Code 13-14-8-4

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account the following:

- 1) All existing physical conditions and the character of the area affected.
- 2) Past, present, and probable future uses of the area, including the character of the uses of

surrounding areas.

3) Zoning classifications.

4) The nature of the existing air quality or existing water quality, as appropriate.

5) Technical feasibility, including the quality conditions that could be reasonably be achieved through coordinated control of all factors affecting the quality.

6) Economic reasonableness of measuring or reducing any particular type of pollution.

7) The right of all persons to an environment sufficiently uncontaminated as not to be injurious to:

- (A) human, plant animal, or aquatic life; or
- (B) the reasonable enjoyment of life and property.

Consistency with Federal Requirements

The amended rules are consistent with federal laws.

IDEM Contact

Additional information regarding this rulemaking action can be obtained by calling (800) 451-6027 (in Indiana), press 0 and ask for Janet Perkowski, Rule Development Section, Office of Air Management, or for extension 3-8628, or dial (317) 233-8628.